

Eugene J. Wait, Jr., Esq.
Nevada Bar #1794
WAIT LAW FIRM
305 W. Moana Lane
Suite E, Second Floor
Reno, Nevada 89509
Telephone: (775) 827-5500
Facsimile: (775) 827-6663
ewait@waitlaw.com

Attorney for Defendant
RECOVERY SERVICES NORTHWEST, INC.,
d/b/a CUSTOM RECOVERY

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

U.S. BANK, N.A.,

Case 2:13-cv-01254-APG-GWF

Plaintiff,

v.

RECOVERY SERVICES
NORTHWEST, INC., d/b/a
CUSTOM RECOVERY,
et al.,

STIPULATION AND ORDER
RE: DEPOSITION OF JAMES MORIN

(Second Request)

Defendant,

_____/

Due to an illness connected to his family, Defendant previously requested that the time to conduct James Morin's deposition (Defendant's president) and Defendant's FRCP 30(b)(6) deposition, be extended. The parties thus previously stipulated to conduct Mr. Morin's deposition and Defendant's FRCP 30(b)(6) deposition by May 30, 2016. ECF No. 54.

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2 Defendant represents that James Morin is the designee for
3 Defendant's FRCP 30(b)(6) deposition. Plaintiff timely noticed
4 Mr. Morin's deposition in his individual capacity and timely
5 noticed Defendant's FRCP Rule 30(b)(6) deposition. The court
6 then ordered Mr. Morin's depositions to take place
7 simultaneously in both capacities on May 25 or 26, 2016 at
8 Plaintiff counsel's office in Las Vegas. ECF No. 70.

9
10 Defense counsel has a scheduling conflict with those dates
11 and has requested Mr. Morin's deposition be moved. Plaintiff
12 agreed to accommodate Defendant's request and conduct the
13 deposition on June 8, 2016. The Court also recently extended
14 the time to conduct the deposition of Heather Williams, who
15 worked for Defendant, through June 30, 2016. ECF No. 71. The
16 extension of Mr. Morin's depositions will thus not interfere
17 with other case deadlines.

18
19 This is the parties' second stipulated request to extend
20 the deadline to depose Mr. Morin and Defendant's FRCP 30(b)(6)
21 deposition.

22
23 The Parties to the above entitled action, by their
24 undersigned counsel of record, therefore mutually request the
25 Court extend the time to conduct Mr. Morin's deposition in his
26 individual capacity and as Defendant's FRCP 30(b)(6) deposition
27 to June 8, 2016, when such deposition shall take place. The
28

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Attorneys At Law

305 W. Moana Lane, Second Floor, Reno, Nevada 89509
Tel: (775) 827-5500 • Fax (775) 827-6663

deposition shall take place at the law offices of HOLLAND & HART, LLP, 9555 Hillwood Drive, 2nd floor, Las Vegas, Nevada, 89134, for a maximum total duration of seven (7) hours of record testimony.

Dated: May 20, 2016.

HOLLAND & HART, LLP
9555 Hillwood Drive
2nd Floor
Las Vegas, Nevada 89134

By /s/ Ryan A. Loosvelt
Ryan A. Loosvelt, Esq.
Nevada Bar #8550

Attorney for Plaintiff
U.S. BANK, N.A.

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By: //s// Eugene J. Wait, Jr.
Eugene J. Wait, Jr.
Nevada Bar #1794

Attorney for Defendant
RECOVERY SERVICES NORTHWEST, INC.,
d/b/a CUSTOM RECOVERY

ORDER

IT IS SO ORDERED.



U.S. MAGISTRATE JUDGE

Dated: May 24, 2016.